

RASKIN & RASKIN  
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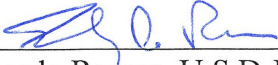
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## MEMO ENDORSED

August 30, 2021

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

The application is   x   granted  
\_\_\_\_\_ denied

  
Edgardo Ramos, U.S.D.J.  
Dated: 08/30/2021  
New York, New York

Re: United States v. David Pike, No. 17-cr-630 (ER)

Dear Judge Ramos:

This firm represents David Pike who has been charged in a criminal information with conspiracy to commit bank fraud in violation of Title 18 USC §371. Bail has been set at \$500,000 personal surety and, among other standard conditions, Mr. Pike's travel is restricted to the Southern District of Florida and the Eastern and Southern Districts of New York. Mr. Pike has complied with all conditions of his bond.

David Pike and his wife founded Crystal Academy, a non-profit, 501(C)3, non-sectarian, private school that provides an academic and therapeutic learning environment for children between the age of 5 and adolescents. The school provides a holistic individualized program for children with developmental issues including autism, attention deficit disorder, developmental academic disorders, and nonverbal learning disorders.

The Crystal Academy campus is in Coral Gables, Florida. However, Crystal is considering the possibility of opening a second school location in Orlando. It is currently exploring location opportunities and beginning the process of interviewing initial personnel in Orlando. Mr. Pike is Crystal's point person for these functions. Accordingly, we request the court's permission for Mr. Pike to travel to the Orlando area for 1-2 day work trips over the next several months without making a separate motion for each trip. Prior to each trip, he would, of course, notify and obtain permission from Pretrial Services. We ran this by Mr. Pike's Pretrial Services officer, Nora Heredia-Burgos, who has no objection to this proposal. In addition, I discussed this matter with Assistant US Attorney Nick Folly, who advises that the government has no objection to this request.

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Therefore, it is respectfully requested that the court enter an order allowing Mr. Pike to travel to the Orlando area for 1-2 day work trips over the next several months without making a separate motion for each trip, upon advance notice to, and permission from, Pretrial Services.

Respectfully yours,

/s/Martin R. Raskin  
MARTIN R. RASKIN